

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- x **DEFENDANTS' PROPOSED  
VERDICT SHEET**

LAKISHA BRYANT, AS MOTHER AND NATURAL  
GUARDIAN OF INFANT I.K., LOURETTE MATHURIN,  
AS MOTHER AND NATURAL GUARDIAN OF  
INFANT J.M.,

Plaintiffs,

-against-

MARK SEREBRENİK; FRANK STANKEVICIUS; LUIS  
FALCON; MATTHEW COLON; JOSEPH PALMIOTTO,

Defendants.

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**False Arrest -- John Mathurin**

1. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that any of the following officers falsely arrested him on February 12, 2015:

Mark Serebrenik	Yes _____	No _____
Frank Stankevicius	Yes _____	No _____
Luis Falcon	Yes _____	No _____
Matthew Colon	Yes _____	No _____
Joseph Palmiotto	Yes _____	No _____

If you answered "No" as to all defendants, please proceed to Question 4 on page 2.

If you answered "Yes" as to any defendant, please proceed to Question 2.

2. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that he suffered actual compensatory damages as a result of being falsely arrested?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered "No" to Question 2, state the amount of nominal damages to be awarded to the Plaintiff not to exceed one dollar:

\$ \_\_\_\_\_

If you answered "yes" to Question 2, indicate the dollar amount of any actual compensatory damages plaintiff John Mathurin has proven that he sustained that were proximately caused as a result of being falsely arrested:

\$ \_\_\_\_\_

3. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that he is entitled to punitive damages as a result of the false arrest claims?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered "NO" to Question 3, please proceed to Question 4.

If you answered "YES" to Question 3, please state the amount of punitive damages plaintiff John Mathurin has proven that he sustained that were proximately caused as a result of being falsely arrested.

\$ \_\_\_\_\_

4. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that any of the defendants failed to intervene to prevent plaintiff from being falsely arrested. **If you answered "Yes" as to any defendant in response to Question 1, you must answer "No" as to that defendant in response to this Question:**

Mark Serebrenik	Yes _____	No _____
Frank Stankevicius	Yes _____	No _____
Luis Falcon	Yes _____	No _____
Matthew Colon	Yes _____	No _____
Joseph Palmiotto	Yes _____	No _____

If you answered "No" as to all defendants, please proceed to Question 7 on page 4.

If you answered "Yes" as to any defendant, please proceed to Question 5.

5. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that he suffered actual compensatory damages as a result of any defendants' failure to intervene?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered "No" to Question 5, state the amount of nominal damages to be awarded to the Plaintiff not to exceed one dollar:

\$ \_\_\_\_\_

If you answered “yes” to Question 5, indicate the dollar amount of any actual compensatory damages plaintiff John Mathurin has proven that he sustained that were proximately caused as a result of a defendant’s failure to intervene:

\$ \_\_\_\_\_

6. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that he is entitled to punitive damages as a result of the failure to intervene claim?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered “NO” to Question 6, please proceed to Question 7.

If you answered “YES” to Question 6, please state the amount of punitive damages plaintiff John Mathurin has proven that he sustained that were proximately caused as a result of being falsely arrested.

\$ \_\_\_\_\_

**False Arrest – Isaiah King**

7. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that any of the following officers falsely arrested him on February 12, 2015:

Mark Serebrenik	Yes _____	No _____
Frank Stankevicius	Yes _____	No _____
Luis Falcon	Yes _____	No _____
Matthew Colon	Yes _____	No _____
Joseph Palmiotto	Yes _____	No _____

If you answered “No” as to all defendants, please proceed to Question 13 on page 5.

If you answered “Yes” as to any defendant, please proceed to Question 8.

8. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that he suffered actual compensatory damages as a result of being falsely arrested?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered “No” to Question 8, state the amount of nominal damages to be awarded to the Plaintiff not to exceed one dollar:

\$ \_\_\_\_\_

If you answered “yes” to Question 8, indicate the dollar amount of any actual compensatory damages plaintiff Isaiah King has proven that he sustained that were proximately caused as a result of being falsely arrested:

\$ \_\_\_\_\_

9. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that he is entitled to punitive damages as a result of the false arrest claims?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered “NO” to Question 9, please proceed to Question 10.

If you answered “YES” to Question 9, please state the amount of punitive damages plaintiff Isaiah King has proven that he sustained that were proximately caused as a result of being falsely arrested.

\$ \_\_\_\_\_

10. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that any of the defendants failed to intervene to prevent plaintiff from being falsely arrested. **If you answered “Yes” as to any defendant in response to Question 7, you must answer “No” as to that defendant in response to this Question:**

Mark Serebrenik	Yes _____	No _____
Frank Stankevicius	Yes _____	No _____
Luis Falcon	Yes _____	No _____
Matthew Colon	Yes _____	No _____
Joseph Palmiotto	Yes _____	No _____

If you answered “No” as to all defendants, please proceed to Question 13 on page 5.

If you answered “Yes” as to any defendant, please proceed to Question 11.

11. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that he suffered actual compensatory damages as a result of any defendants’ failure to intervene?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered "No" to Question 5, state the amount of nominal damages to be awarded to the Plaintiff not to exceed one dollar:

\$ \_\_\_\_\_

If you answered "yes" to Question 5, indicate the dollar amount of any actual compensatory damages plaintiff Isaiah King has proven that he sustained that were proximately caused as a result of a defendant's failure to intervene:

\$ \_\_\_\_\_

12. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that he is entitled to punitive damages as a result of the failure to intervene claim?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answered "NO" to Question 12, please proceed to Question 13.

If you answered "YES" to Question 12, please state the amount of punitive damages plaintiff Isaiah King has proven that he sustained that were proximately caused as a result of being falsely arrested.

\$ \_\_\_\_\_

**Denial of a Right to Fair Trial – John Mathurin**

13. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that he was denied his right to a fair trial by Mark Serebrenik?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered "No" to Question 13, please proceed to Question 15.

If you answered "Yes" to Question 13, indicate the dollar amount of any actual compensatory damages plaintiff John Mathurin has proven that he sustained that were proximately caused as a result of a denial of a right to fair trial:

\$ \_\_\_\_\_

14. Did plaintiff John Mathurin prove by a preponderance of the credible evidence that he is entitled to punitive damages as a result of the denial of a right to a fair trial claim?

Yes \_\_\_\_\_ No \_\_\_\_\_ If yes, in what amount? \_\_\_\_\_

**Denial of a Right to Fair Trial – Isaiah King**

15. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that he was denied his right to a fair trial by Mark Serebrenik?

Yes \_\_\_\_\_ No \_\_\_\_\_

If you answered “No” to Question 15, please sign and date the form and tell the marshal that the jury has reached a verdict.

If you answered “Yes” to Question 15, indicate the dollar amount of any actual compensatory damages plaintiff Isaiah King has proven that he sustained that were proximately caused as a result of a denial of a right to fair trial:

\$ \_\_\_\_\_

16. Did plaintiff Isaiah King prove by a preponderance of the credible evidence that he is entitled to punitive damages as a result of the denial of a right to a fair trial claim?

Yes \_\_\_\_\_ No \_\_\_\_\_ If yes, in what amount? \_\_\_\_\_

Please sign and date the form and tell the marshal that the jury has reached a verdict.

\_\_\_\_\_, 2017  
Brooklyn, New York

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FOREPERSON